

1           Q     Well, in fact, BellSouth knew its actual system,  
2 Encore, couldn't pass the volume test, correct?

3           A     (Witness Weeks) I wouldn't be able to say yes or  
4 no to that.

5           Q     You would agree that BellSouth indicated to you  
6 that it's production system could not handle the volume  
7 anticipated in these volume tests?

8           A     (Witness Weeks) They represented to us that they  
9 did not believe that their production system would be able  
10 to support those volumes, but I don't know that that was  
11 based on empirical evidence. I don't know. You would have  
12 to ask BellSouth.

13          Q     Do you know any reason why BellSouth couldn't  
14 simply have improved their production system to handle the  
15 volume tests?

16          A     (Witness Weeks) They could have done so. The  
17 reasons they gave for doing that were mostly based upon  
18 cost.

19          Q     They did not want to spend the money it would take  
20 to bring their system up to level it would need to be to  
21 pass the volume test?

22          A     (Witness Weeks) That was the representation that  
23 was made to us.

24          Q     Now in setting up RSIMMS, BellSouth didn't simply  
25 duplicate the Encore system, did it?

1           A     (Witness Weeks) By duplicate, you're asking -- if  
2     you're asking me if the RSIMMS environment and the Encore  
3     environment are a mirror image of one another, the answer is  
4     they are not.

5           Q     In fact, the computers in the two systems are  
6     different, are they not?

7           A     (Witness Weeks) By design.

8           Q     Because you needed one to handle the heavier  
9     workload than the other could handle?

10          A     (Witness Weeks) In part.

11          Q     You would agree that with light workloads RSIMMS  
12     has more computing power than does Encore?

13          A     (Witness Weeks) Actually there are machines in  
14     the Encore environment that are more powerful than the  
15     machines in RSIMMS environment. But if you compare  
16     workloads that are actually the subject of the volume tests,  
17     and you compare the machines that those workloads run on,  
18     then it's fair to characterize the RSIMMS environment as  
19     being more powerful than Encore.

20          Q     Would you agree that with the light workloads  
21     RSIMMS has the more powerful computing process?

22          A     (Witness Weeks) Yes.

23          Q     Let's look at the two systems. Three applications  
24     were tested during the volume test, correct? TAG, LESOG and  
25     LNP, is that correct?

1           A       (Witness Weeks) Well we're mixing apples and  
2 oranges here. TAG is an interface that's used by CLECs, as  
3 is the EDI interface, so we were testing the interfaces from  
4 our perspective. There are a number of pieces of software  
5 systems that exist on the BellSouth side that get involved  
6 in processing pre-order queries and orders submitted by us  
7 as the test CLEC.

8           Q       On the UNIX server applications were the three  
9 main application groups evaluated TAG, LESOG and LNP?

10          A       (Witness Weeks) That's fair.

11          Q       All right. Let's look at the computers in each  
12 one of those. For your reference, I will point you to --  
13 everything I'm going to ask you comes from the RSIMMS  
14 report, pages 6 through 8, or pages 29 through 33.

15          A       (Witness Weeks) Okay.

16          Q       And if you look at page 7 of the RSIMMS report --

17          A       (Witness Weeks) Yes.

18          Q       -- the TAG servers, they used two HP K570  
19 computers, is that correct?

20          A       (Witness Weeks) Yes.

21          Q       And in RSIMMS they used three HP K580 computers.

22          A       (Witness Weeks) That's correct.

23          Q       These computers had four CPUs and two gigabits of  
24 memory, is that accurate?

25          A       (Witness Weeks) Yes.

1 Q Whereas the computers used in RSIMMS had four CPUs  
2 and four gigabits of memory?

3 A (Witness Weeks) That's correct.

4 Q One difference -- another difference between the  
5 two was for this server there was a backup and there was not  
6 on here. Do you agree with that?

7 A (Witness Weeks) Yes.

8 Q Now as your report indicated, the computing power  
9 of the RSIMMS versus the Encore in this situation was 20  
10 percent greater?

11 A (Witness Weeks) Yes.

12 Q If you will go and look at page 20 -- I didn't  
13 bring it over here with me, but it's around 28 or 29. There  
14 is a statement that states there's a backup in one system  
15 and not in the other. I'm looking at page 30.

16 A (Witness Weeks) Yes, there was a backup server, a  
17 K570 in RSIMMS environment.

18 Q And, in fact, if you take the backup server out of  
19 the calculation, RSIMMS in this instance has a 60 percent  
20 greater computing capacity than does Encore, is that  
21 accurate?

22 A (Witness Weeks) Forty percent, not 60 percent.  
23 Twenty and 20 would be 40.

24 Q Well it doesn't say, quote, on page 30 excluding  
25 the backup system. A comparison of the two machines in the

1 RSIMMS environment and Encore production system using  
2 published performance data by HP shows that a 60 percent  
3 increase in relative compute performance existed in the  
4 RSIMMS environment.

5 A (Witness Weeks) Correct.

6 Q Now let's look at LESOG. Now in LESOG and Encore,  
7 you had two HP K520s, right?

8 A (Witness Weeks) What page are you on, just to  
9 make it easier for us to follow you?

10 Q I'm going back to page --

11 A (Witness Weeks) Were you on 8?

12 Q Look at page 8 --

13 A (Witness Weeks) Okay.

14 Q -- where it talks about the LESOG servers.

15 A (Witness Weeks) Yeah. In the RSIMMS or Encore?

16 Q We'll do Encore first.

17 A (Witness Weeks) Okay.

18 Q So under LESOG in the Encore environment, you have  
19 two HP T-520s, is that correct?

20 A (Witness Weeks) That's correct.

21 Q Where as RSIMMS, you had three HP K-580s.

22 A (Witness Weeks) That's correct.

23 Q These have four CPU's and two gigabits of memory.  
24 These have four CPU's and four gigabits of memory, correct?

25 A (Witness Weeks) That's correct.

1           Q     And the statement contained there on page 8 says  
2     the total relative compute performance -- does it state what  
3     the greater computing performance is?

4           A     (Witness Weeks)   Yes.   It would be in the RSIMMS  
5     environment.

6           Q     In RSIMMS, I believe it states far greater than  
7     Encore, is that right?

8           A     (Witness Weeks)   Yeah.   It actually says because  
9     there were three servers in the RSIMMS environment, each of  
10    which had a compute performance four to six times that of  
11    the compute performance of the two servers in the Encore  
12    production environment.

13          Q     Now the last part again states that each of the  
14    computers here has four to six times the computing power of  
15    the computers used in BellSouth's actual production system?

16          A     (Witness Weeks)   That's correct.

17          Q     Now the last one is LNP.   For LNP and Encore, you  
18    use Hewlett Packard K-460 computers, correct?

19          A     (Witness Weeks)   Let's see, Encore was 460s --

20          Q     And RSIMMS again were K-580s, different computers.

21          A     (Witness Weeks)   Yeah, two 580s.

22          Q     And one -- I didn't bother to write all of this  
23    down, but there were different servers.   One had -- Encore  
24    had four CPU's and three gigabits.   One had four CPU's and  
25    two gigabits and one had two CPUs and one gigabit --

1           A     (Witness Weeks)   Right.

2           Q     -- do you agree with that?

3           A     (Witness Weeks)   I agree.

4           Q     Corresponding machines in RSIMMS had -- one had  
5     four CPU's and four gigabits and one had two CPUs and one  
6     gigabit, correct?

7           A     (Witness Weeks)   That's correct.

8           Q     And when they're discussing the relative computing  
9     power of RSIMMS versus BellSouth's actual production system,  
10    it states that RSIMMS, in this application, has an almost  
11    100 percent greater computing power, is that correct?

12          A     (Witness Weeks)   Correct.

13          Q     Now did you agree with BellSouth's decision to run  
14    the volume test in RSIMMS as opposed to Encore -- opposed to  
15    its production system?

16          A     (Witness Weeks)   Well I pointed out that running  
17    the production tests -- excuse me, running the volume tests  
18    in something other than the production environment was not a  
19    strong a record as running that same test in the production  
20    environment, and that's what gave rise to the production  
21    volume tests.

22          Q     Well, in fact, did you put language in the RSIMMS'  
23    portion of the report that essentially distanced KPMG from  
24    much of what was contained in that report talking about the  
25    two different systems?

1           A       (Witness Weeks) I wouldn't characterize what we  
2 said in the RSIMMS report as distancing ourselves from  
3 anything.

4           Q       I'm going to show you several statements that are  
5 contained in the RSIMMS report and ask why you felt it was  
6 necessary to include these. I've got the section. These  
7 are portions of -- these are not complete sections of the  
8 report, but I've got underneath them sited to where they can  
9 be found in the report. 5.0, it might result in lesser  
10 system performance with the production environment. It is  
11 possible performance data will not scale to Encore  
12 production systems. KCI would not validate data provided by  
13 BellSouth about RSIMMS tests and Encore production. And  
14 finally, BellSouth had stated the difference noted in the  
15 TAG server files would not impact the performance of the  
16 systems. Do you see those statements?

17          A       (Witness Weeks) I see each of those statements,  
18 yes.

19          Q       The very last one down here says KCI was unable to  
20 verify the accuracy of this statement. Did you, in fact,  
21 put an assumption in the RSIMMS report that you did not  
22 independently verify information given to you by BellSouth?

23          A       (Witness Weeks) There were certain  
24 representations made to us by BellSouth that we did not  
25 subject to independent validations .



1 Q And are those examples of some of those?

2 A (Witness Weeks) No, actually I think some of  
3 those are findings and some of those are statements of  
4 limitation.

5 Q The deal was the differences between the Encore  
6 system and the RSIMMS environment?

7 A (Witness Weeks) The first one represents a  
8 difference in the two environments. The second one  
9 represents a potential impact of the difference in the two  
10 environments.

11 The third one is a statement of limitations. The  
12 fourth one is just a recitation of a representation made to  
13 us by BellSouth.

14 Q And again, you took no steps to verify the  
15 accuracy of that statement?

16 A (Witness Weeks) We did not do any work to verify  
17 independently that those types of resurgents referred to in  
18 that fourth bullet were true.

19 Q I don't believe you answered my earlier question.  
20 Did you agree with BellSouth's decision to run the volume  
21 testing in the RSIMMS environment as opposed to the Encore?

22 A (Witness Weeks) It wasn't my place to agree or  
23 disagree. I merely noted to the company that running the  
24 volume test in the production environment would be a  
25 stronger record than running it in the RSIMMS environment.

1           Q     And by that, you mean that you warned BellSouth  
2     that by running it in an artificial environment, that could  
3     weaken their position before the FCC?

4           A     (Witness Weeks) I wouldn't have stated it that  
5     way. I would say that -- I would restate what I just said.

6           Q     Did you tell BellSouth that if they were going to  
7     do their volume test in the RSIMMS environment that that was  
8     not as powerful a record to take to Washington as if they  
9     executed that same test in their production environment?

10          A     (Witness Weeks) I said that same thing earlier.

11          Q     Did you also suggest to BellSouth that if they  
12     were going to do so, they should try to make the two systems  
13     as comparable as possible?

14          A     (Witness Weeks) No. In fact, the reason for  
15     RSIMMS was because the company did not have the desire to  
16     make the two systems comparable.

17          Q     BellSouth would not do that, correct?

18          A     (Witness Weeks) They chose at the time we  
19     executed the volume test not to upgrade their production  
20     environment to the level required to meet the volume test.

21                COMMISSIONER DURDEN: Let me ask you this then:  
22     To what extent -- if you can answer this -- should we, as a  
23     Commission, rely on the results of the RSIMMS testing, if  
24     I'm understanding correctly the actual system that BellSouth  
25     uses -- and I presume would be using -- was not tested?

1           WITNESS WEEKS: As we say in our RSIMMS report, it  
2 is our belief that one could make the same upgrades to  
3 hardware, the same upgrades to operating environment, make  
4 the necessary performance and configuration changes that  
5 were made to make the RSIMMS environment robust enough to  
6 handle the volume test. We know of no technical reason why  
7 those same changes cannot be made to the production  
8 environment. So even though the test did not in fact run in  
9 production, we know of no technical reason why the test --  
10 why the system wouldn't be able to support that workload in  
11 the production environment. It's largely a matter of just  
12 upgrading the machines and upgrading the networks and so on.  
13 There's not, as you point out, a record of having run that  
14 test in production, but we don't know of any reason, in all  
15 of the work we saw in RSIMMS, why the production requirement  
16 couldn't be scaled similarly to RSIMMS.

17           COMMISSIONER DURDEN: If I asked you a question  
18 that you don't feel qualified to answer, just let me know.  
19 Do you have any idea how long it would take BellSouth to do  
20 that upgrade, assuming that you're right?

21           WITNESS WEEKS: I believe that upgrade could be  
22 done in a matter of several months. In fact, there is an  
23 upgrade of that ilk that is planned to support the volume  
24 testing in Florida.

25           COMMISSIONER DURDEN: Well I just -- for the

1 record, it troubles me -- it seems to me that -- and this is  
2 a question for BellSouth, but we don't have a BellSouth  
3 witness. It seems to me that if BellSouth wants to have  
4 this certified, and they're going to go to trouble to create  
5 an RSIMMS system for purposes of testing, and if they plan  
6 to upgrade their Encore system to be compatible and to give  
7 the same performance as the RSIMMS did in the testing, why  
8 they didn't just go ahead and do it. I'm not asking you  
9 because you don't work for BellSouth and you can't speak for  
10 them. I'm just saying to BellSouth and to others here, this  
11 is very troubling. There may be a good reason for it, but  
12 I'm reluctant -- I have reservations about -- and you've  
13 addressed some of those. I have reservations about buying  
14 the results of the RSIMMS testing when it was -- when that  
15 system was put together, as I understand it, just for the  
16 purpose of testing and is not a functional part of the  
17 BellSouth system, at least at present. I don't know how we  
18 address that if other members of the Commission come to the  
19 same conclusion. If we were to approve it -- I don't know,  
20 maybe subject to an upgrade that would make it compatible.  
21 It seems to me our job would have been a lot simpler if they  
22 had just built out the production system to start with. Of  
23 course, that's just thinking out loud. If you have any  
24 comments that you feel qualified to make, you're free to.  
25 I'm not saying you can't comment. I'm just saying I don't

1 expect you to because you can't speak for BellSouth.

2 WITNESS WEEKS: I appreciate that. If I can  
3 summarize our thinking on the this issue?

4 COMMISSIONER DURDEN: Okay.

5 WITNESS WEEKS: I think it's that we believe,  
6 based on the work that we did, that the production  
7 environment could be scaled in a way that RSIMMS was -- to a  
8 level that is consistent with what was in RSIMMS. We  
9 believe the application testing that was done against RSIMMS  
10 is representative of the behavior of the system as it would  
11 have existed in the production environment. So while it is  
12 absolutely the case that there was no explicit overt  
13 demonstration, that the production environment does support  
14 those volumes. We believe that there's been a sufficient  
15 demonstration that that could have done -- been done, and  
16 had it been done that the tests would have had the same  
17 results as the RSIMMS test.

18 COMMISSIONER DURDEN: Okay.

19 COMMISSIONER BURGESS: I want to follow up on  
20 Commissioner Durden's questions. I think earlier you said  
21 something about spending the money and that was a reason  
22 that BellSouth told you -- one reason that they didn't do  
23 the test in a production environment was because of the cost  
24 of building the actual upgrades to the Encore system. How  
25 much did it cost to build a test environment? I mean, you

1     could have took that money and enhanced the production  
2     environment and tested it instead.

3             COMMISSIONER DURDEN:  And now they've got to spend  
4     that money to upgrade again.

5             WITNESS WEEKS:  It's my understanding that the  
6     RSIMMS environment already existed.  Now whether it existed  
7     in its exact form, I couldn't comment on.  But it wasn't  
8     created solely for the purposes of passing the volume test.

9     There's also one other concern that all ILECs express when  
10    you talk about running the volume test in production, and  
11    that is if it fails and there's significant problems, real  
12    customers, real CLECs, real orders, real consumers in the  
13    state of Georgia would have been impacted, and the company  
14    was concerned about that as well.

15            MR BARBER:  May I follow up on a couple of those  
16    questions, sir?

17            COMMISSIONER BURGESS:  Go ahead.

18    BY MR. BARBER:

19            Q     In fact, you can tell us of no other state in  
20    which you performed these tests in an artificial environment  
21    instead of the production system, is that correct?

22            A     (Witness Weeks)  There are none To my knowledge.

23            Q     Let me follow up on Commissioner Durden's  
24    questions to you.  Would you agree that the volume tests  
25    that you perform do not prove that BellSouth's regular

1 production system, the ones that the CLECs will have to use,  
2 can currently pass the volume tests ordered by this  
3 Commission?

4 A (Witness Weeks) The work that we did would not  
5 demonstrate either way whether they could or couldn't.

6 Q And would you agree that you have performed no  
7 test that assures that BellSouth could increase the capacity  
8 of Encore to a level necessary to pass the volume test?

9 A (Witness Weeks) We have done no demonstration  
10 that that's true.

11 Q Have you done any tests to prove that during the  
12 process of upgrading Encore CLEC's operations would not be  
13 impacted?

14 A (Witness Weeks) We've done no work on that at  
15 all.

16 Q And have you done any tests that would show that  
17 the increased capacity of Encore can accommodate the real  
18 world transaction mix that'll be presented to it?

19 A (Witness Weeks) Because we didn't do any work --  
20 COMMISSIONER BURGESS: Now you just asked a good  
21 question. When will it be presented to them? That's what  
22 we've been trying to get a handle on -- this Commission.  
23 It's one thing to build it and they come, it's another thing  
24 to build it and they don't come. We've been in that -- you  
25 hit right on the head, when we get to it. I want to know --

1 that's what I've been asking for the last six years. When  
2 are we going to get to it? I've heard so many promises and  
3 so many commitments made in this hearing room about when  
4 we're going to get there. That's why I'm in betwixt and  
5 between on this volume testing sometimes. The commitment  
6 has been made on when we're going to get there. You just  
7 hit it on the head. You said it again, when we get there.  
8 When is that, 2010, 2020? We're sitting here trying to use  
9 our professional judgment to determine was that test good  
10 enough that was done in this RSIMMS environment because we  
11 don't see that we're going to get to a production  
12 environment where we'll see the volume of orders being  
13 produced that would potentially crash these systems. So it  
14 puts us in a difficult position as a Commission to make that  
15 call. How much testing is enough versus real world -- the  
16 numbers that we're seeing? The numbers of orders that are  
17 being provided. That's a personal dilemma that I know I  
18 struggle with as a Commissioner trying to figure out when do  
19 we get there. That's just a comment, not a question to  
20 anybody.

21 (Laughter.)

22 COMMISSIONER BURGESS: That's directed to  
23 everybody in this audience, because from day one that's been  
24 my thrust as a Commissioner. All these tariffs, all these  
25 dockets that we've had before us, my concern is ensuring



1 that consumers in Georgia get the benefits of having an open  
2 market. I keep that before me. You can lose sight some of  
3 the times of that goal with all of the other stuff that's  
4 put before you. That's where I'm at, at that's my bottom  
5 line. Out of all of this that we go through, I want  
6 consumers in the state of Georgia to be in a position where  
7 they can receive the benefits of an AT&T, or an MCI, or  
8 Sprint or Covad providing us service in this state.

9 MR. BARBER: I can certainly understand that. I  
10 can certainly understand your frustration because you have a  
11 far greater scope of responsibility than I do. The point of  
12 these questions is that with regard to the volume testing  
13 they're not there. Those are all of the questions I have.

14 COMMISSIONER DURDEN: Well let me just -- let me  
15 just add that the major concern I have is that I'm  
16 concerned, as Commissioner Burgess is, for those things.  
17 But I'm also concerned that if we get there, and when we get  
18 there, that we not have a mess on our hands. I would rather  
19 have it and not need it than need it and not have it. So  
20 that's a major -- on the other hand, don't get your hopes  
21 up. I'm also as impatient as Commissioner Burgess and some  
22 others to get this process on down the road, but I think  
23 we've got to make sure that we're ready when it does happen.

24 MR. McCALLUM: Yes, sir, Mr. Chairman. Thank you  
25 very much.

FURTHER CROSS-EXAMINATION

BY MR. McCALLUM:

Q Mr. Weeks, Mr. Frey, my name is Fred McCallum. I represent BellSouth. I have just a few questions, to follow up on this issue about RSIMMS.

Do you all happen to have a copy of the Master Test Plan with you? Which version do you have?

A (Witness Weeks) I believe it's March 16<sup>th</sup>, 2001. Oh, this -- these are the appendices.

Q Do you happen to have the December 1999 version of the Master Test Plan?

A (Witness Weeks) Hold on a second. I thought we had it, and we don't. If you have a copy, it might facilitate.

Okay, we have it. I'm sorry. I apologize. Bad label. And...

Q What version?

A (Witness Weeks) ...version 4.2. Well, it's a mixture of 4.2, 4.1. Different pages have different version numbers on them.

Q Do you happen to have Version 4.0, by any chance?

A (Witness Weeks) I don't believe we do.

Q Okay.

A (Witness Weeks) Well, actually there are pages that are labeled 4.0 imbedded in here as well. What page

1 would you like to...

2 Q I've got Version 4.0. Let me direct you to page  
3 Roman numeral II-3.

4 A (Witness Weeks) Middle of the paragraph says "B  
5 scope"?

6 Q Yes, sir. And right above that do you have a  
7 paragraph entitled, "Volume Testing Environment"?

8 A (Witness Weeks) Yes, we do.

9 Q Could you read that.

10 A (Witness Weeks) Says...

11 Q Well, let me back up just a minute. What is the  
12 date of the Master Test Plan you've got there?

13 A (Witness Weeks) On this page is labeled December  
14 15<sup>th</sup>, 1999, and it is annotated as Version 4.0.

15 Q Okay. So this would be as of December 15<sup>th</sup>, 1999,  
16 the Master Test Plan; correct?

17 A (Witness Weeks) That's correct.

18 Q And this version was filed by KPMG, I believe;  
19 correct?

20 A (Witness Weeks) Yes.

21 Q I've got the cover letter. It was.

22 A (Witness Weeks) Yes.

23 Q Can you read that paragraph to us, please, about  
24 what it said about a test environment in December of 1999.

25 A (Witness Weeks) "Normal and peak volume tests

1 will be run against a volume test environment RSIMMS  
2 developed by BellSouth to support the transaction volume  
3 specified in the test. KPMG will evaluate this environment  
4 to determine if the hardware and software configurations  
5 mirror those of BellSouth's production systems, except where  
6 additional hardware or software resources have been created  
7 to support the specified test volume. The entire volume  
8 test bed, except CRIS, is a duplicate of their production  
9 systems. RSIMMS does not access production CRIS."

10 Q All right, sir.

11 A (Witness Weeks) I mean to say it does. I read  
12 "did." "Does not."

13 Q All right, sir. And so this -- as of December of  
14 1999, the Master Test Plan that had been filed included a  
15 description of how the volume test was going to be done, and  
16 how the volume test environment was going to be set up;  
17 correct?

18 A (Witness Weeks) That's correct.

19 Q And it basically described what you have described  
20 here today, the fact that it would be done in RSIMMS, and  
21 that there would be an evaluation done by KPMG of that  
22 RSIMMS environment against the production environment to  
23 satisfy yourselves that it either mirrored it, or if it  
24 didn't mirror it exactly, it could be expected to mirror it  
25 in the production environment; is that correct?

1           A       (Witness Weeks) I believe that's correct.

2           Q       Now, did that evaluation take place by KPMG?

3           A       (Witness Weeks) Yes, it did. That's the RSIMMS  
4 report.

5           Q       Now I'm in the Master Test Plan that we've been  
6 looking at, and I'm in Paragraph 5.0, and I'm right above  
7 the quotes Mr. Barber has on the chart here. Now, right  
8 above those quotes it says -- and I'm on Page 5 of the  
9 report. Basically says, "Based upon KCI's evaluation, it is  
10 our opinion that, except for specific pre-authorized changes  
11 made in RSIMMS to support the requirements of the volume  
12 test, the applications implemented in the RSIMMS environment  
13 mirrored those of BellSouth's Encore production system"; is  
14 that correct?

15          A       (Witness Weeks) That's correct.

16          Q       Okay. So you made an evaluation of the system,  
17 the RSIMMS system, against the production system, and  
18 rendered an opinion about whether those two mirrored each  
19 other; correct?

20          A       (Witness Weeks) We compared hardware to hardware  
21 and application software to application software.

22          Q       Okay. Now, to be fair, you've said except for  
23 specific pre-authorized changes in that -- in that opinion?

24          A       (Witness Weeks) That's correct.

25          Q       And those are addressed down in the next

1 paragraph; correct?

2 A (Witness Weeks) Yes, they are.

3 Q Okay. Now, you also looked at those changes, a  
4 number of which I assume are what we just went through with  
5 Mr. Barber here earlier about the differences in the  
6 hardware and -- and the like?

7 A (Witness Weeks) No, actually these would be  
8 differences that -- changes that were actually made to the  
9 application software. All the previous discussions were  
10 about hardware.

11 Q Okay. So you made -- in this section you looked  
12 at -- you said specific changes were made to the RSIMMS  
13 environment to support the business volumes required to  
14 accomplish KCI's volume test; correct?

15 A (Witness Weeks) That's correct.

16 Q And so you satisfied yourself there that any --  
17 you said basically KCI is satisfied that these same changes  
18 could be made to the production environment such that it  
19 could support the same volumes as were tested in KCI's  
20 volume evaluation; is that correct?

21 A (Witness Weeks) Yes.

22 Q Okay. Now, you mentioned that there was a  
23 production volume test run on TAG and EDI; correct?

24 A (Witness Weeks) That's correct.

25 Q And I believe that appears at -- is it page Roman

1 numeral V-J-1, and subsequent pages? And that's of the  
2 master test -- the final report, Master Test Plan. I'm on  
3 page Roman numeral V-J-1 of the final report, Master Test  
4 Plan.

5 A (Witness Weeks) Yes, the production volume test  
6 information is contained starting at that page.

7 Q So there was a production volume test run for EDI  
8 and TAG as a part of this test; is that correct?

9 A (Witness Weeks) That's correct.

10 Q Okay. If I understand it, it was a little bit  
11 different than the production test we were describing  
12 earlier in the RSIMMS environment; correct?

13 A (Witness Weeks) It was somewhat different. The  
14 same type of test, but different parameters.

15 Q Now, if I read through this section, I believe I  
16 find that all of the test criteria in this section were  
17 satisfied; is that correct?

18 A (Witness Weeks) That's accurate.

19 Q Now, you had -- you had conference calls on --  
20 what? --a weekly basis that KPMG had conference calls  
21 starting, you said, mid-2000? I think it was early --  
22 probably January 2000. But sometime in 2000 you started  
23 having weekly conference calls to the CLECs; correct?

24 A (Witness Weeks) I believe that was our testimony;  
25 yes.

1           Q     Can you recall during any one of those calls any  
2 party or CLEC raising any of the concerns about the RSIMMS  
3 test environment?

4           A     (Witness Frey) I can recall questions about the  
5 RSIMMS test environment in general, but I don't recall any  
6 specific concerns. Nor do -- but I'm not sure I would  
7 recall them sitting here today.

8           Q     Okay. But just sitting here today, you don't  
9 recall any specific concerns, as we've seen mentioned here  
10 today, in any of those weekly conference calls?

11          A     (Witness Frey) No.

12          Q     Okay. That's all I have. Thank you.

13                COMMISSIONER BURGESS: Covad?

14                MS. BOONE: I just have a few.

15                        FURTHER CROSS-EXAMINATION

16 BY MS. BOONE:

17          Q     I just want to finish touching on something you  
18 were just discussing with Mr. McCallum. Now, you said that  
19 you looked at RSIMMS and Encore, and determined that they  
20 mirrored each other in some ways; is that right?

21          A     (Witness Weeks) We compared hardware to hardware.  
22 They did then mirror one another. We compared application  
23 software to application software, and except for the changes  
24 that were identified in our report, they in fact mirrored  
25 one another.



1           Q     Okay. Did you ever run a test stack of the same  
2 transactions, both in RSIMMS and in Encore, and compare the  
3 results?

4           A     (Witness Weeks) Yes, we did.

5           Q     You did? And is that reported in the report?

6           A     (Witness Weeks) No. The independent sections of  
7 the report would indicate that difference.

8           Q     Okay. Now, for volume testing you did that?

9           A     (Witness Weeks) We ran a volume test in RSIMMS.  
10 We ran a volume test in the production environment. One  
11 could compare the results from those two tests. We did not  
12 have an explicit activity to compare the performance of  
13 those two.

14          Q     Okay. Was it the same test stack or not? Was it  
15 the same transactions or not?

16          A     (Witness Weeks) Yes, same order types, same  
17 pretty much everything.

18          Q     Same volumes?

19          A     (Witness Weeks) No, of course not. It was by  
20 design not the same volumes.

21          Q     I think earlier -- I just want to be clear, now.  
22 You didn't do any volume testing on xDSL electronic  
23 ordering, because you didn't do any testing on xDSL  
24 electronic ordering; correct?

25          A     (Witness Weeks) That's correct.